

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Parts 74, 76 and 78 of the)	MB Docket No. 17-231
Commission’s Rules Regarding Maintenance)	
of Copies of FCC Rules)	
)	
Modernization of Media Regulation Initiative)	MB Docket No. 17-105

**COMMENTS OF
NCTA – THE INTERNET & TELEVISION ASSOCIATION**

NCTA – The Internet & Television Association (“NCTA”)¹ submits these comments in response to the Notice of Proposed Rulemaking in the above-captioned docket.² The cable industry supports the Commission’s common sense proposal to eliminate rules requiring cable entities to maintain paper copies of Commission regulations.³ Doing so will help to “advance the Commission’s goal of reducing outdated regulations and unnecessary regulatory burdens that can impede competition and innovation in media markets.”⁴

As described in the *Notice*, certain rules have “outlived their usefulness” and no longer serve the public interest.⁵ In particular, in today’s electronic age, it makes no sense to require

¹ NCTA is the principal trade association for the U.S. cable industry, representing cable operators serving approximately 85 percent of the nation’s cable television households and more than 200 cable program networks. The cable industry is the nation’s largest provider of broadband service after investing more than \$250 billion over the last two decades to build two-way interactive networks with fiber optic technology. Cable companies also provide state-of-the-art competitive voice service to more than 30 million customers.

² *See In re Amendment of Parts 74, 76 and 78 of the Commission’s Rules Regarding Maintenance of Copies of FCC Rules, Modernization of Media Regulation Initiative*, Notice of Proposed Rulemaking, FCC 17-121, MB Dkt. Nos. 17-231 & 17-105 (rel. Sept. 26, 2017) (“*Notice*”).

³ *See Notice* ¶ 1.

⁴ *Id.* ¶ 2.

⁵ *Id.* ¶ 4; *see also id.*, *Statement of Commissioner Clyburn* (endorsing elimination of the hard copy requirement as an example of a rule that has “outlived its usefulness or is now unnecessary”).

cable operators to maintain hard copies of part 76 of the Commission’s rules, and EAS Operating Handbooks, as required by Section 76.1714(a).⁶ The requirement wastes resources and is unjustified today given that the materials are readily available for free to anyone with access to the Internet.⁷ Moreover, the electronic versions of the documents are better resources for all given that they are typically more accessible and more current than a print copy.⁸

The Commission should adopt the changes proposed in the *Notice*. Such action would serve the public interest by reducing costs and providing better access to up-to-date information, while promoting a wider trend toward modernization and accessibility through the use of electronic documents.

Respectfully submitted,

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⁶ See *Notice* ¶ 4; 47 C.F.R. § 76.1714(a).

⁷ See *id.*, *Statement of Chairman Pai* (explaining that regulated entities “would still have to remain familiar with the rules. They’d simply be given the option of doing so online, and wouldn’t be mandated to maintain paper copies that hardly anybody uses anymore. Every dollar that broadcast and cable entities don’t have to spend keeping paper copies of something that’s an Internet search away can be spent on providing better service to the public”).

⁸ See Press Release, Gov’t Publishing Office (GPO), *Congressional Committee Commends GPO for Digital Initiatives* (July 11, 2017) (commending the GPO, publisher of the Code of Federal Regulations, for its “skilled use of digital technology,” which “has allowed the agency to constrain the costs of its operations while expanding Government information access options to the American people, bringing greater openness and transparency to the operations of Congress and the Government”), available at <https://www.gpo.gov/who-we-are/news-media/news-and-press-releases/congressional-committee-commends-gpo-for-digital-initiatives>.